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November 22, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Eric Komitee, U.S.D.J.
225 Cadman Plaza East
Courtroom 6G North
Brooklyn, NY 11201-1804

Re: Williams v. The Russo's Payroll Group, Inc., et al.
Case No.: 1:21-cv-2922 (EK) (CLP)
MLLG File No.: 75-2021

Dear Judge Komitee:

This office represents Defendants The Russo's Payroll Group, Inc. d/b/a Russo's on the Bay (hereinafter the "Corporate Defendant"), Frank Russo, Jr. ("Frank"), and Giuseppe "Joe" Vacca¹ ("Giuseppe") (Frank and Giuseppe collectively hereinafter the "Individual Defendants") (the Corporate Defendant and the Individual Defendants collectively hereinafter the "Defendants") in the above-referenced case.

Defendants write to respectfully request an extension of time until Friday, December 10, 2021 to submit their reply papers in further support of their motion to dismiss the complaint.

The reason for this request is because the current deadline falls on Friday, November 26, 2021 – during Thanksgiving – and your undersigned has two (2) all-day depositions scheduled on Monday, November 29, 2021 and Thursday, December 2, 2021 with an in-person court appearance on Friday, December 3, 2021. Defendants thus need additional time to submit their reply papers in this case. There has been one (1) previous request for an extension of the deadline to submit the moving papers in this case, which request was granted. The adversary only consents to an extension of time for Defendants to submit their reply in further support until Friday, December 3, 2021. However, for the reasons stated above, Defendants respectfully submit that this is insufficient time for Defendants' counsel to submit their reply papers given their commitments in other matters.

Accordingly, Defendants respectfully submit that they have established sufficient good cause for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(B)(1)(A).

Defendants thank this honorable Court for its time and attention to this case.

¹ This office does not represent Defendant Robert Russo.

Dated: Lake Success, New York
November 22, 2021

MILMAN LABUDA LAW GROUP PLLC

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